

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Application of California Water Service  
Company (U60W) for a Certificate of Public  
Convenience and Necessity to Provide Water  
Service to Travis Air Force Base and to Establish  
Rates.

Application 17-05-\_\_\_\_  
(Filed May 15, 2017)

**MOTION OF CALIFORNIA WATER SERVICE COMPANY (U60W)  
FOR LEAVE TO FILE CONFIDENTIAL INFORMATION UNDER SEAL**

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May 15, 2017

**BEFORE THE PUBLIC UTILITIES COMMISSION  
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Application of California Water Service Company (U60W) for a Certificate of Public Convenience and Necessity to Provide Water Service to Travis Air Force Base and to Establish Rates.

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**I. INTRODUCTION**

Pursuant to Rule 11.4 of the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”), California Water Service Company (“Cal Water”) files this motion for leave to file confidential information under seal. As required by Rule 11.4, a proposed ruling is attached to this motion as Attachment 1.

Concurrently with this motion, Cal Water is filing an application seeking a Certificate of Public Convenience and Necessity to provide public utility potable water service to Travis Air Force Base and to establish rates for this service. Cal Water has entered into a 50-year agreement with the United States Department of Defense to acquire the water distribution assets of Travis AFB and provide water utility service beginning in 2018.

**II. RELIEF REQUESTED**

The Travis AFB Award/Contract is attached to the application as Appendix A. Attachments and Exhibits to the Award/Contract are provided as attachments to the Direct Testimony of Paul Townsley (“Townsley Direct Testimony”). Cal Water seeks leave to file the following Attachments to Townsley Direct Testimony under seal and have them be treated as confidential:

Attachment 1: JA3 (Travis AFB Water Distribution System)

Attachment 4: Exhibit JE1 (Service Interruption/Contingency & Catastrophic Loss Plan)

Attachment 5: Exhibit JE2 (Operations & Maintenance/Quality Management Plan)

Attachment 6: Exhibit JE3 (ISDCs/Upgrades/Connections and R&R Plan)

Attachment 7: Exhibit JE4 (Operational Transition Plan)

Attachment 8: Exhibit JE5 (Appendices for Water)

Attachment 10: Exhibit JE7 (Subcontracting Plan)

Attachment 11: Exhibit JE8 (Price Proposal)

### **III. JUSTIFICATION FOR RELIEF**

All of the documents identified above warrant confidential treatment under California Public Utilities Commission General Order 66-C, which states that records or information specifically precluded from disclosure by statute are not open to public inspection.

Attachments 6 and 11 (Exhibit JE3 (ISDCs/Upgrades/Connections and R&R Plan) and Exhibit JE8 (Price Proposal)) are confidential under Cal Evid. Code §1060 and should not be disclosed publically or to third parties because they contain confidential trade secret information relating to practices, processes, and procedures for the internal provision of services, which, if released to competitors, could prove harmful. Attachments 6 and 11 are also confidential under Cal. Govt. Code section 6255(a) because the public interest served by not disclosing these documents clearly outweighs the public interest served by disclosure of these documents.

Attachments 1, 4, 5, 7, 8, and 10 (JA3 (Travis AFB Water Distribution System), Exhibit JE1 (Service Interruption/Contingency & Catastrophic Loss Plan), Exhibit JE2 (Operations & Maintenance/Quality Management Plan), Exhibit JE4 (Operational Transition Plan), Exhibit JE5 (Appendices for Water), and Exhibit JE7 (Subcontracting Plan)) are confidential under Cal. Govt. Code §6254(e) and should not be disclosed publically or to third parties because they contain confidential information relating to utility systems development. They are also confidential under Cal. Govt. Code section 6255(a) because they contain information regarding a secure Air Force Base and because of the need to protect vital infrastructure from the risk of terrorism. As such, the public interest served by not disclosing these documents clearly outweighs the public interest served by disclosure of these documents.

Pursuant to D.16-08-024, Cal Water has included with the Attachments to Townsley Direct Testimony declarations signed by an officer of Cal Water attesting to the need to for confidential treatment of these documents.

**IV. CONCLUSION**

For the reasons stated above, Cal Water respectfully requests that the Commission grant it leave to file under seal the documents identified in this motion.

Respectfully submitted,

By /s/ Lori Anne Dolqueist  
Lori Anne Dolqueist

Attorney for Applicant California Water Service Company

## ATTACHMENT 1

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Application of California Water Service Company (U60W) for a Certificate of Public Convenience and Necessity to Provide Water Service to Travis Air Force Base and to Establish Rates.

Application 17-05-\_\_\_\_  
(Filed May 15, 2017)

**[PROPOSED] RULING GRANTING MOTION OF  
CALIFORNIA WATER SERVICE COMPANY (U60W)  
FOR LEAVE TO FILE CONFIDENTIAL INFORMATION UNDER SEAL**

**I. INTRODUCTION**

On, May 15, 2017, pursuant to Rule 11.4 of the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”), California Water Service Company (“Cal Water”) filed a motion for leave to file confidential information under seal. This Ruling grants the relief requested.

**II. REQUEST FOR RELIEF**

Cal Water sought leave to file under seal the following documents included in the Attachments to the Direct Testimony of Paul Townsley for its application for a Certificate of Public Convenience and Necessity to provide public utility potable water service to Travis Air Force Base:

Attachment 1: JA3 (Travis AFB Water Distribution System)

Attachment 4: Exhibit JE1 (Service Interruption/Contingency & Catastrophic Loss Plan)

Attachment 5: Exhibit JE2 (Operations & Maintenance/Quality Management Plan)

Attachment 6: Exhibit JE3 (ISDCs/Upgrades/Connections and R&R Plan)

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Attachment 8: Exhibit JE5 (Appendices for Water)

Attachment 10: Exhibit JE7 (Subcontracting Plan)

Attachment 11: Exhibit JE8 (Price Proposal)

### **III. JUSTIFICATION FOR RELIEF**

All of the documents identified above warrant confidential treatment under California Public Utilities Commission General Order 66-C, which states that records or information specifically precluded from disclosure by statute are not open to public inspection.

Attachments 6 and 11 (Exhibit JE3 (ISDCs/Upgrades/Connections and R&R Plan) and Exhibit JE8 (Price Proposal)) are confidential under Cal Evid. Code §1060 and should not be disclosed publically or to third parties because they contain confidential trade secret information relating to practices, processes, and procedures for the internal provision of services, which, if released to competitors, could prove harmful. Attachments 6 and 11 are also confidential under Cal. Govt. Code §6255(a) because the public interest served by not disclosing these documents clearly outweighs the public interest served by disclosure of these documents.

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### **IV. RELIEF GRANTED**

No party objected to Cal Water's request to file the identified documents under seal. Cal Water's request is reasonable and is supported by the facts and therefore is granted.

Dated: \_\_\_\_\_

By: \_\_\_\_\_